

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**FFWCT, LLC; USA FLAG, LLC; AND  
TRAVIS BURNETT,**

**Plaintiffs,**

**v.**

**USA FOOTBALL, INC.,**

**Defendant.**

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**Civil Action Nos. 4:23-cv-00465-ALM**

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**FFWCT, LLC’S, USA FLAG, LLC’S, AND TRAVIS BURNETT’S MOTION TO SEAL  
DOCUMENTS DESIGNATED AS CONFIDENTIAL OR ATTORNEYS’ EYES ONLY**

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Pursuant to Local Rule CV-5(a)(7), FFWCT, LLC, USA Flag, LLC, and Travis Burnett (collectively “USA Flag”) move for leave to file under seal two exhibits in connection with their Sur-Reply in opposition to USA Football’s motion for summary judgment regarding “national governing body” in Civil Action No. 4:23-cv-00465-ALM. Both of these documents has been designated as Confidential or Attorneys Eyes Only by one or more parties or a non-party to this matter, pursuant to the Protective Order (Dkt. 21).

The documents to be filed under seal are referenced in the Declaration of Mark D. Nielsen, filed concurrently herewith (“Nielsen Decl.”), and include:

1. Exhibit 1 to the Nielsen Decl. – Excerpts from the deposition transcript of Curtis Hollomon, which have been designated either Confidential or Attorneys Eyes Only by USA Flag.
2. Exhibit 2 to the Nielsen Decl. – Excerpts from the deposition transcript of Charles Davis, which have been designated either Confidential or Attorneys Eyes Only by USA Flag.

Accordingly, in compliance with Local Rule CV-5(a)(7)(E) requiring sealing of “information that has been designated as confidential or proprietary under a protective order,”

USA Flag respectfully requests that these documents be sealed and admitted into evidence with their Sur-Reply in opposition to USA Football's motion for summary judgment regarding "national governing body."

USA Flag further respectfully requests that if for any reason any portion of this Motion is denied, the Court not strike the documents (as contemplated by Local Rule CV- 5(a)(7)(E)), but instead allow them to appear on the docket unsealed.

Respectfully submitted,

**SCHEEF & STONE, L.L.P.**

Date: July 5, 2024

/s/ Mark D. Nielsen

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**ATTORNEYS FOR FFWCT, LLC, USA  
FLAG, LLC, AND TRAVIS BURNETT**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on July 5, 2024, a true and correct copy of the foregoing was electronically filed with the Court using the ECF system, which will send a notification of the filing via electronic mail to all counsel of record.

/s/ Mark D. Nielsen

Mark D. Nielsen